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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
 PRIVACY USER PROFILE LITIGATION

MDL No. 2843
 Case No. 18-md-02843-VC-JSC

This document relates to:

JOINT STATUS UPDATE

ALL ACTIONS

Judges: Hon. Vince Chhabria and
 Hon. Jacqueline Scott Corley
 Courtroom: VIA VIDEOCONFERENCE
 Hearing Date: November 16, 2021
 Hearing Time: 9:00 a.m.

1 Since the October 20 hearing, the parties had one full-day discovery mediation session.
2 During that session, the parties worked with the mediators to address a deposition protocol and third-
3 party subpoenas. Outside of mediation, the parties held multiple meet and confer sessions regarding
4 each party's discovery requests and the scope of third-party discovery.

5 Since the parties' last joint statement, Special Master Garrie has issued orders (i) granting in
6 part Plaintiffs' motion to compel discovery responses related to "business partners"; (ii) granting
7 Facebook's request for a protective order in connection with two specific inaccessible API call log
8 tables—Facebook agreed to produce a separate, accessible table, and per the Special Master's order
9 will do so by December 1, 2021; and (iii) granting, in part, Plaintiffs' motion to compel the inclusion
10 of Mark Zuckerberg and Sheryl Sandberg as document custodians through a "targeted search and
11 collection" of "information not available through other data sources." Special Master Garrie also
12 issued a deposition protocol, which will become final unless Plaintiffs decide to seek reconsideration
13 by November 18, 2021. The parties further briefed a dispute regarding whether Plaintiffs are entitled
14 to additional data relating to the Named Plaintiffs under Discovery Order No. 9, Dkt. No. 557, and
15 provided the Special Master submissions regarding ADI. The Special Master will hold a hearing
16 regarding ADI on December 4. Additionally, the parties have exchanged lists of proposed deponents
17 and dates for their depositions, and Mediator Andler advised the parties to work to agree to
18 deposition dates early this week.

19 In addition to these discovery items, the parties' mediation session with the Honorable Jay
20 Gandhi (Retired) has been rescheduled for November 20, 2021.

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1 Dated: November 15, 2021

Respectfully submitted,

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